

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No.: 1:24-cv-20755-KMW**

AVR Group LLC et al

Plaintiff,

v.

Alebrije Entertainment LLC et al

Defendant.

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**MOTION TO APPEAR *PRO HAC VICE*,  
CONSENT TO DESIGNATION, AND REQUEST TO  
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rules 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Alexander Nicholas Loftus of the law firm of Loftus & Eisenberg, Ltd., 161 N. Clark, Suite 1600, Chicago, IL 60601, (312) 899-6625, for purposes of appearance as co-counsel on behalf of AVR GROUP, LLC, TRIDENT ASSET MANAGEMENT, INC., and MICHAEL DZIURGOT, in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Alexander Nicholas Loftus to receive electronic filings in this case, and in support thereof states as follows:

1. Alexander Nicholas Loftus is not admitted to practice in the Southern District of Florida and is a member in good standing of the Illinois Bar & District Court of the Northern District of Illinois.

2. Movant, Ross Michael Good, Esquire, of the law firm of Loftus & Eisenberg, Ltd., 161 N. Clark, Suite 1600, Chicago, IL 60601, (786) 539-3952, is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be

required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Alexander Nicholas Loftus has made payment of this Court's \$200 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Alexander Nicholas Loftus, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Alexander Nicholas Loftus at email address: alex@loftusandeisenberg.com.

WHEREFORE, Ross Michael Good, moves this Court to enter an Order Alexander Nicholas Loftus, to appear before this Court on behalf of AVR GROUP, LLC, TRIDENT ASSET MANAGEMENT, INC., and MICHAEL DZIURGOT, for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Alexander Nicholas Loftus.

Date: March 4, 2024

Respectfully submitted,

/s/Ross Michael Good

Ross Michael Good  
FL Bar No.: 116405  
ross@loftusandeisenberg.com  
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Attorneys for AVR GROUP, LLC, TRIDENT ASSET  
MANAGEMENT, INC., and MICHAEL DZIURGOT

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**CERTIFICATION OF ALEXANDER NICHOLAS LOFTUS**

Alexander Nicholas Loftus, Esquire, pursuant to Rule 4(b)(1) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys, hereby certifies that: (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; (2) I am a member in good standing of Illinois Bar & District Court of the Northern District of Illinois; and (3) I have not filed more than three pro hac vice motions in different cases in this District within the last 365 days.



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Alexander Nicholas Loftus